

REMARKS

As a result of the November 5, 2002 Office Action/Final Rejection, claims 1-53 remain pending in this application, all of which have been finally rejected. Claims 3, 14, 23, and 36 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Tannenbaum (U.S. Patent No. 5,442,376) and Greanias (U.S. Patent No. 5,157,384). Claims 4-13, 15-22, 24-31, and 37-53 have been rejected under section 103(a) as being unpatentable over Tannenbaum and Greanias in view of Kou (U.S. Patent No. 6,085,265). Claims 1, 2, and 32-35 have been rejected as being unpatentable over Kou in view of Tannenbaum and Greanias.

Applicants respectfully submit that the Final Rejection is based on a flawed reading of the prior art Greanias and Tannenbaum patents, and thus applicants request reconsideration of the Final Rejection. The cornerstone of the Final Rejection – and of the Examiner's response to the amendment filed on July 26, 2002 – is that Greanias and Tannenbaum teach a “user profile” that contains commands that are not interpretable by an application program. Greanias and Tannenbaum, however, teach no such feature. Greanias and Tannenbaum state quite emphatically that the commands listed in the user profile are interpretable by the application program. Moreover, neither Greanias nor Tannenbaum motivates or suggests any modification to the user profile so as to list commands not interpretable by the application program.

The teachings of Greanias and Tannenbaum have been set forth applicants' response to the March 26, 2002 Office Action, and that summary need not be repeated here. However, applicants highlight below how the claim feature of “a genre comprising a set of semantics and not including commands interpretable by the application programs” is both novel and non-

obvious over the references cited:

In response to the March 26, 2002 Office Action, applicants amended each of the independent claims to recite “a genre comprising a set of semantics and not including commands interpretable by the application programs,” or a similar feature. The Examiner reads the claimed “genre” onto the “user profile” of Greanias and Tannenbaum, and argues that “the user profile is interpretable by the environmental link and not the application programs. The environmental link then sends the processed information to the application.” (Final Rejection, ¶ 13.) Therefore, the Examiner argues, the “user profile” meets the amended limitation of “comprising a set of semantics and not including commands interpretable by the application programs.” The Examiner relies on this line of reasoning to reject all of the independent claims (See Final Rejection, ¶¶ 3-6, 8, 11-12.)

Greanias and Tannenbaum, however, do not teach a user profile that meets the claim feature of “a genre comprising a set of semantics and not including commands interpretable by the application programs.” Both Greanias and Tannenbaum make it clear that the user profile is a list of command interpretable by an application program. Greanias states:

The interface profile module 104 is comprised of sets of application profiles 105 and the user profiles 107, which are files which list input messages produced by the AIS 103 from the input signals received by input devices 36, 38, 40, mapped to keyboard, mouse or other commands *which are usable by existing application programs*, e.g., mouse clicks, keystroke messages, MACROs, utility programs, etc.

[Greanias, col. 7, l. 66 through col. 8, l. 5 (emphasis added).] Similarly, Tannenbaum states:

The profiles [user profile and application profile] link the registration ID numbers of the input event to a corresponding command *which will be understood by the target object* or by another object which the user anticipates being in the system.

[Tannenbaum, col. 8, ll. 18-21 (emphasis added).] (Tannenbaum explains elsewhere that the “target object” can be an application program, such as the application that owns a particular window on a display. See col. 7, ll. 46-53.)

In other words, it is clear that both Greanias and Tannenbaum teach a user profile comprised of commands that *are* interpretable by the application program. While the Examiner asserts that the user profile only contains commands interpretable by the environment link, this assertion misconstrues the relationship between the “user profile” and “environment link.”

Greanias clearly states that, after an input message is received,

environment link 101 refers to the application profile 105 ... for the command which corresponds to the input message The environment link 101 then ... checks the user profile 107 to determine whether there is a higher priority command which would override the command from the application profile 105. The environment link 101 determines which command has higher priority The environment link 101 ... then sends the higher priority command ... to the integrated operating environment 56 which routes the command to the active application program

[Greanias, col. 8, l. 61 through col. 9, l. 7.] Tannenbaum contains a similar explanation of the environment link. (See Tannenbaum, col. 6, ll. 7-11.) In other words, the environment link employs the user profile to determine which command interpretable by an application program corresponds to a given input message. The actual commands themselves, as described above, are contained in the user profile (and the application profile). The Examiner’s assertion that the user profile contains commands interpretable by the environmental link but not by the application program is simply wrong.

Since the Examiner's assertion about the relationship between the "user profile" and "environment link" is the lynchpin of the rejection, and since this assertion is clearly wrong, applicants request that the Examiner reconsider and withdraw the rejection of the independent claims. Neither Greanias nor Tannenbaum teaches or suggests a user profile that meets the limitation of "a genre comprising a set of semantics and not including commands interpretable by the application programs"; nor do these references motivate any modification or extension that would meet this feature. (The Examiner has also applied Kou to certain features of the claims; while Kou is not relied upon as teaching the genre feature discussed herein, applicants note that Kou does not teach, suggest, or motivate a genre meeting the language of the claims.)

Moreover, since all of the independent claims have been demonstrated to be patentable over the references cited, the dependent claims are likewise patentable at least by reason of their dependency, and applicants request that the rejection of the independent claims be reconsidered and withdrawn as well.

CONCLUSION

For all of the foregoing reasons, applicants respectfully request that the Examiner reconsider and withdraw the Final Rejection of claims 1-53. Applicants submit that this case is in condition for allowance, and request that a Notice of Allowance issue forthwith.

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